REMARKS

The Office Action of **March 19, 2003**, has been received and its contents carefully noted. Applicants respectfully submit that this response is timely filed and fully responsive to the Office Action.

Claims 1-14 and 29-37 were pending the present application prior to the above amendment, with claims 15-28 withdrawn from consideration as being directed to a non-elected invention. By the above amendment, claims 1-14, and 29-37 are amended. No new matter is introduced (see, e.g., Specification, page 24, line 23 to page 25, line 10). Accordingly, claims 1-14 and 29-37 remain pending in this application, of which claims 1, 6, 11, 30, and 34 are independent, and which are believed to be in condition for allowance for at least the reasons stated below.

35 U.S.C. §112, First Paragraph, Rejections

In response to the rejection of claims 1-14 and 29-37 under 35 U.S.C. §112, first paragraph, as allegedly being based on a disclosure that is not enabled, claims 1, 6, 11, 30 and 34 have been amended to recite that an insulating film is formed by a plasma CVD using TEOS, as suggested by the Examiner and as clearly supported by the Specification, page 24, line 23 to page 25, line 10. In addition, claims 1, 6, 11, 30 and 34 have been amended to recite irradiating a second laser light onto an insulating film formed by plasma CVD using TEOS, claims 2, 7, 12, 31 and 35 have been amended to recite that the second laser light is a pulse laser light, and claims 3, 8, 13, 32 and 36 have been amended to recite that the second laser light has an energy density of 250 to 300 mJ/cm^2 and which amendments also are believed to be clearly supported by the Specification. Accordingly, no new matter believed to have been introduced.

Thus, Applicants submit that all of the present claims are in compliance with 35 U.S.C. §112 and no further rejection on such a basis is anticipated. If, however, the Examiner disagrees, the Examiner is invited to contact the undersigned attorney who will be happy to work with the Examiner in a joint effort to derive a mutually satisfactory solution.

35 U.S.C. §103 Rejections

Claims 1-4, 6-9, 11-13, 29, 30-33 and 34-37 also were rejected under 35 U.S.C. §103(a) as being unpatentable *Misawa et al.* (USP 5,274,279) in view of allegedly admitted prior art, *Wang et al.* (USP 5,000,133) and *Ang et al.* (Electrical characterization ..."); and claims 5 and 10 also were rejected under 35 U.S.C. §103(a) as being unpatentable *Misawa et al.* in view of allegedly admitted prior art, *Wang et al.*, *Ang et al.* and further in view of JP 60-187030). Applicants respectfully contend that independent claims 1, 6, 11, 30 and 34 and claims dependent therefrom, as amended, are clearly patentably distinct over the applied references and the allegedly admitted prior art, alone or in combination, for at least the reasons advanced below.

The Applied References and the Allegedly Admitted Prior Art Alone or in Combination Fail to Teach or Suggest the Claimed Invention

Applicants respectfully contend that the applied references and the allegedly admitted prior art, alone or in combination, clearly fail to teach or suggest each and every element defined by the pending claims, as amended. For example, independent claims 1, 6, 11, 30 and 34, as amended, recite irradiating a second laser light onto an insulating film formed by plasma CVD using TEOS, advantageously, reducing an interfacial layer density. The noted features are neither taught nor suggested by the applied references and the allegedly admitted prior art, alone or in combination.

By contrast, the applied references and the allegedly admitted prior art, taken alone or in combination, fail to teach or suggest the noted features. For example, *Ang et al.* fails to disclose irradiating a second laser light onto an insulating film formed by plasma CVD using TEOS, as recited in independent claims 1, 6, 11, 30 and 34, for reducing an interfacial layer density. Similarly, the remaining applied references, *Misawa et al.*, and *Wang et al.*, and JP 60-187030 and the allegedly admitted prior art, fail to cure the noted deficiencies in *Ang et al.*, as also clearly failing to teach or suggest the noted features. Accordingly, the applied references and the allegedly admitted prior art, alone or in combination, clearly fail to teach or suggest irradiating a second laser light onto an insulating film formed by plasma CVD using TEOS, as recited in independent claims 1, 6, 11, 30 and 34.

The Dependent Claims are Allowable over the Applied References Alone or in Combination

Dependent claim 2-5, 7-10, 12-14, 29, 31-33, and 35-37 are allowable over the applied references and the allegedly admitted prior art, alone or in combination, on their own merits and for at least the reasons discussed above with respect to independent claims 1, 6, 11, 30 and 34. For example, dependent claims 2, 7, 12, 31 and 35, as amended, recite that the second laser light is a pulse laser light, and claims 3, 8, 13, 32 and 36, as amended, recite that the second laser light has an energy density of 250 to 300 mJ/cm^2. The noted features are neither taught nor suggested by the applied references and the allegedly admitted prior art, alone or in combination.

The Present Amendment Should be Entered

The present amendment is submitted in accordance with the provisions of 37 C.F.R. §1.116, which after Final Rejection permits entry of amendments placing the claims in better form for consideration on appeal. As the present amendment is believed to overcome outstanding rejections under 35 U.S.C. §§112 and 103, the present amendment places the application in better form for consideration on appeal. It is therefore respectfully requested that 37 C.F.R. §1.116 be liberally construed, and that the present amendment be entered.

The Non-Applied References

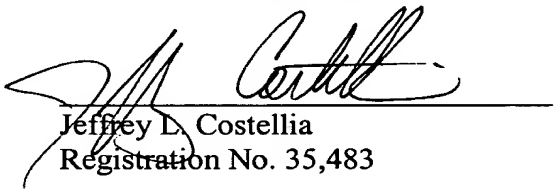
The references that have been cited, but not applied by the Examiner, have been taken into consideration during formulation of this response. However, since these references were not considered by the Examiner to be of sufficient relevance to apply against any of the claims, no detailed comments thereon is believed to be warranted at this time.

Conclusion

Therefore, it is believed that independent claims 1, 6, 11, 30 and 34 and claims dependent therefrom are clearly patentably distinct over the applied references and the allegedly admitted prior art, alone or in combination. In view of the foregoing remarks, reconsideration and withdrawal of the rejection is earnestly solicited.

Having responded to all rejections set forth in the outstanding final Office Action, it is submitted that the claims are now in condition for allowance. An early and favorable Notice of Allowance is respectfully solicited. In the event that the Examiner is of the opinion that a brief telephone or personal interview will facilitate allowance of one or more of the above claims, the Examiner is courteously requested to contact Applicants' undersigned representative.

Respectfully submitted,



Jeffrey L. Costellia
Registration No. 35,483

JLC/crv:crv

Nixon Peabody LLP
8180 Greensboro Drive, Suite 800
McLean, Virginia 22102
(703) 770-9300